



Oppenheim
+ Zebrak, LLP

Matthew J. Oppenheim
4530 Wisconsin Avenue NW | 5th Floor
Washington, DC 20016
T: (202) 450-3958 | F: (866) 766-1678
matt@oandzlaw.com | www.oandzlaw.com

February 14, 2020

VIA FACSIMILE

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Cengage Learning, Inc., et al. v. Does 1-48*,
S.D.N.Y. Case No. 20-cv-769-JGK

Dear Judge Koeltl:

We represent Plaintiffs Cengage Learning, Inc., Bedford, Freeman & Worth Publishing Group, LLC, Elsevier Inc., McGraw Hill LLC, and Pearson Education, Inc. ("Plaintiffs") in the above-referenced action. We write to request that the sealing order imposed in connection with the Court's Order dated January 29, 2020 ("Order") be lifted. On February 13, 2020, Plaintiffs served Defendants at the email addresses provided to Plaintiffs by payment processors, hosts, and registrars and identified as associated with Defendants' respective websites and accounts. Attached is a copy of Plaintiffs' Declaration of Service of Process, which Plaintiffs will file on the ECF docket once available (or under seal on February 18, 2020 if the ECF docket is not yet available by the close of business).

Thank you for the Court's consideration of these requests.

Sincerely,

/s/ Matthew J. Oppenheim

Matthew J. Oppenheim

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#
DATE FILED: 2-19-20

*The sealing order in this
Case is lifted. No documents
should remain sealed.
So ordered.*

*per G Koeltl
2/18/20
U.S.D.-5.*

Hon. John G. Koeltl

February 14, 2020

Page 2

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CENGAGE LEARNING, INC., BEDFORD,
FREEMAN & WORTH PUBLISHING GROUP,
LLC d/b/a MACMILLAN LEARNING, ELSEVIER
INC., MCGRAW HILL LLC, and PEARSON
EDUCATION, INC.,

Plaintiffs,

v.

DOE 1 d/b/a ALLEBOOKSVITAL.COM, DOE 2
d/b/a ANLIFESTYLES.COM, DOE 3 d/b/a
BLOGSHIRTS68.CLUB, DOE 4 d/b/a
BOOKDESKSHOP.COM, DOE 5 d/b/a
BOSSIVA.COM, DOE 6 d/b/a
DUPLANACA.COM, DOE 7 d/b/a
DURANBOOKS.COM, DOE 8 d/b/a
EBESTREADER.COM, DOE 9 d/b/a
EBOOK.ENGASTORE.COM, DOE 10 d/b/a
EBOOKCLOUDS.COM, DOE 11 d/b/a
EBOOKLISTTOP.COM, DOE 12 d/b/a
EBOOKSMARTLY.COM, DOE 13 d/b/a
EBOOKSNOW.ORG, DOE 14 d/b/a
EBOOKSPACES.COM, DOE 15 d/b/a
EBOOKSPOT.SHOP, DOE 16 d/b/a
EBOOKSROCKET.COM, DOE 17 d/b/a
ECOEBOOK.COM, DOE 18 d/b/a
EDUPLIFY.COM, DOE 19 d/b/a
EPERFECTEDU.COM, DOE 20 d/b/a
ESTORESELECT.COM, DOE 21 d/b/a
EVOMALLS.COM, DOE 22 d/b/a
FRIDAYCOLLECTION.MYSHOPIFY.COM, DOE
23 d/b/a GOGOODDISCOUNT.COM, DOE 24
d/b/a HLSHIRT.COM, DOE 25 d/b/a
HUNTERBUUK.COM, DOE 26 d/b/a
INTELLEGANTMARKETS.COM, DOE 27 d/b/a
IZIEBOOK.COM, DOE 28 d/b/a JENLION.CO,
DOE 29 d/b/a JENWIND.CO, DOE 30 d/b/a
JOLOSTORE.COM, DOE 31 d/b/a KA-
SHOPP.MYSHOPIFY.COM, DOE 32 d/b/a
KIWIBOOKCLUB.MYSHOPIFY.COM, DOE 33
d/b/a MAGIC.ENGASTORE.COM, DOE 34 d/b/a
NOAMALLS.COM, DOE 35 d/b/a

Case No. 20-cv-769-JGK

OSCARMALLS.COM, DOE 36 d/b/a
 PAYVERSITYSTORE.MYSHOPIFY.COM, DOE
 37 d/b/a PRICEAIRSTORE.COM, DOE 38 d/b/a
 RITZYISH.US, DOE 39 d/b/a SHEELLAS.COM,
 DOE 40 d/b/a SMART-EDU-
 STORE.MYSHOPIFY.COM, DOE 41 d/b/a
 SOURCE4STUDENT.COM, DOE 42 d/b/a
 STINGMALL.COM, DOE 43 d/b/a
 STUDENTNCLASS.MYSHOPIFY.COM, DOE 44
 d/b/a STUDYHALLPRESS.COM, DOE 45 d/b/a
 TEESPOPS.COM, DOE 46 d/b/a
 TESTBANKKLICK.COM, DOE 47 d/b/a
 TOPBOOKS.ZIPLOMA.COM, AND DOE 48 d/b/a
 VALERIEHOPTOP.COM

Defendants.

DECLARATION OF SERVICE OF PROCESS

I, Matthew J. Oppenheim, hereby declare as follows:

1. Pursuant to the Court's Ex Parte Order issued on January 29, 2020, authorizing service by email, I caused (1) the January 29th Order, (2) the Complaint and Exhibits, (3) the Summons, (4) the Memorandum of Law in support of the Order to Show Cause, (5) the Declaration of Matthew J. Oppenheim and the exhibits thereto, (5) the Declaration of Dan Seymour and the exhibits thereto, (6) the Declaration of Richard Essig, (7) the Declaration of William Gadoury, (8) the Declaration of Kelly McCann, (9) the Declaration of Steven Rosenthal, (10) the Declaration of Jessica Stitt, and (11) the February 5, 2020 Order, to be served via email on February 13, 2020 on Does 1 – 48, doing business as, respectively, allebooksvital.com, anlifestyles.com, blogshirts68.club, bookdeskshop.com, bossiva.com, duplanaca.com, duranbooks.com, ebestreader.com, ebook.engastore.com, ebookclouds.com, ebooklisttop.com, ebooksmartly.com, ebooksnow.org, ebookspaces.com, ebookspot.shop, ebooksrocket.com, ecoebook.com, eduplify.com, eperfectedu.com, estoreselect.com, evomalls.com, fridaycollection.myshopify.com, gogooddiscout.com, hlshirt.com, hunterbuuk.com, intellegantmarkets.com, iziebook.com,

jenlion.co, jenwind.co, jolostore.com, ka-shopp.myshopify.com, kiwibookclub.myshopify.com, magic.engastore.com, noamalls.com, oscarmalls.com, payversitystore.myshopify.com, priceairstore.com, ritzyish.us, sheellas.com, smart-edu-store.myshopify.com, source4student.com, stingmall.com, studentnclash.myshopify.com, studyhallpress.com, teespops.com, testbankklick.com, topbooks.ziploma.com, and valeriehoptop.com as follows:

<u>Defendant</u>	<u>Email Addresses</u>
Doe 1 d/b/a allebooksvital.com	allebooksvital@gmail.com
Doe 2 d/b/a anlifestyles.com	vandoanbql@gmail.com
Doe 3 d/b/a blogshirts68.club	admin@dahomedecor.com blogshirts68@gmail.com dammanh891@gmail.com 0528524276@kyguihang.com hlteen86@gmail.com
Doe 4 d/b/a bookdeskshop.com	haniff_haslam@outlook.com trakeembintalha@gmail.com
Doe 6 d/b/a duplanaca.com	support@ebookzoom.com xuanmanhkh538@gmail.com support@duplanaca.com xplannet@gmail.com
Doe 7 d/b/a duranbooks.com	support@duranbook.com liviamace08huyjizxkkss@gmail.com amnamrizvi@gmail.com
Doe 8 d/b/a ebestreader.com	bestreader.contact@gmail.com muhdizhan1986@hotmail.com
Doe 9 d/b/a ebook.engastore.com	xuantruong21nd@gmail.com ebook@engastore.com linhdinh.utc@gmail.com tieutientrieudo@gmail.com
Doe 10 d/b/a ebookclouds.com	ebookclouds.com@gmail.com thienminh31527@gmail.com
Doe 11 d/b/a ebooklisttop.com	support@ebooklisttop.com myerssilviae481@gmail.com
Doe 12 d/b/a ebooksmartly.com	rafanbinwaseefw@gmail.com
Doe 13 d/b/a ebooksnow.org	admin@ebooksnow.org ebooksnowteam@gmail.com

<u>Defendant</u>	<u>Email Addresses</u>
Doe 14 d/b/a ebookspaces.com	ebookspaces.com@gmail.com pinder37@gmail.com brendadmarsh@gmail.com motoquay@gmail.com info@teescan.com
Doe 15 d/b/a ebookspot.shop	ebookspot2019@gmail.com myfavoritethings02@gmail.com
Doe 16 d/b/a ebooksrocket.com	info@ebooksrocket.com allebookshophelp@gmail.com
Doe 17 d/b/a ecoebook.com	livingmistore1987@outlook.com Support@ecoebook.com stevenhuvan@gmail.com laniejulieey98@gmail.com vernitavalared5vu@gmail.com stackbettinaeswu@gmail.com sombobienphap@gmail.com doductai727183@gmail.com keybonner288156@gmail.com trandinhnhung81625@gmail.com kiethgabriella38v8@gmail.com
Doe 18 d/b/a eduplify.com	muhdzainbinmalik@hotmail.com
Doe 19 d/b/a eperfectedu.com	mohdsabilsadaqat@outlook.my
Doe 20 d/b/a estoreselect.com	harrisq07@gmail.com jamwang40@gmail.com
Doe 21 d/b/a evomalls.com	support@evomalls.com payment@evomalls.com chad6mlawrence2zvub@yahoo.com anhngo42914@gmail.com vuongpham873942@gmail.com dangle66013@gmail.com dinhly554724@gmail.com hale343931@gmail.com gregory9nlawrence11z3i@yahoo.com michael0whowell27diq@yahoo.com ernest5yboyd2htl8@yahoo.com lethattho598671@gmail.com
Doe 22 d/b/a fridaycollection.myshopify.com	ahmadanwaribinzakaria@outlook.my fdaycollection.contact@gmail.com ibrahimroslan01@gmail.com
Doe 23 d/b/a gogooddiscout.com	support@gogooddiscout.com mostafizur.riyad@gmail.com mohiy13234@win-777.net

<u>Defendant</u>	<u>Email Addresses</u>
Doe 24 d/b/a hlshirt.com	admin@dahomedecor.com dahomedecors@gmail.com vitakandace31499@gmail.com
Doe 25 d/b/a hunterbuuk.com	jaliliman@outlook.my hunterbook.main@gmail.com
Doe 26 d/b/a intellegantmarkets.com	sabek20020@gmail.com bassil2811968@gmail.com banoramaalabour@gmail.com
Doe 27 d/b/a izicbook.com	support@pizado.com upport@plutostars.com
Doe 28 d/b/a jenlion.co	dtstore@shopmail.me
Doe 29 d/b/a jenwind.co	support@pizado.com
Doe 30 d/b/a jolostore.com	support@jolostore.com kaolastore20192020@outlook.com vht14012015@outlook.com weeweestore@gmail.com quynhlan14697@gmail.com stevenhuvan@gmail.com snydertravis16961@gmail.com payment@rubigshop.com phamphidiep253027@gmail.com tranthoenminh1965v@gmail.com levyburris340402@gmail.com dinhhung111189@gmail.com baltimoreturleyj0jg@gmail.com lucasnjrussellx@gmail.com tassinmcalpinjk7@gmail.com domanhcuong630376@gmail.com bentleyewing378246@gmail.com michelarzito@gmail.com zara0yfoster9n@gmail.com shottscarrithersgsdk@gmail.com mckaywitt42215@gmail.com eruifxb.654.55uyrdf@gmail.com chiasebucanh@gmail.com rollinsholder697933@gmail.com elaineegarzaql3e3@yahoo.com payment@shortsmenabc.store clayaoayu@yahoo.com peckcooley19989@gmail.com mcintyreocrane278748@gmail.com dawnspace1@gmail.com salascotton54037@gmail.com

<u>Defendant</u>	<u>Email Addresses</u>
	kozakrayner1ijs@gmail.com lexuanthuy56622@gmail.com
Doe 31 d/b/a ka-shopp.myshopify.com	nizarsaidin72@outlook.com azmeerkh@gmail.com
Doe 32 d/b/a kiwibookclub.myshopify.com	kiwibookclub21@gmail.com info.koalaprint@gmail.com
Doe 33 d/b/a magic.engastore.com	wudqyz49@gmail.com magic@engastore.com xuantruong21nd@gmail.com
Doe 34 d/b/a noamalls.com	contact@noamalls.com
Doe 35 d/b/a oscarmalls.com	contact@oscarmalls.com zsell@vnistock.com
Doe 36 d/b/a payversitystore.myshopify.com	info.payversitystore@gmail.com blizzardbooks@outlook.com
Doe 37 d/b/a priceairstore.com	support@priceairstore.com martastaggs6@gmail.com hollisspotwooddadon9d@gmail.com bachtieu30@gmail.com tamrafollandmaruska6lp@gmail.com trongtrongbach@gmail.com teayonual@gmail.com coryschwanbeckmarierdnps@gmail.com cananhbach11@gmail.com violettepascullibruh2jid@gmail.com salenathornellmasottim6pn@gmail.com violatrasportorndorff25hmk@gmail.com maishagutermuthstamanddv9@gmail.com lavernahosszieskeom015@gmail.com giongaibig@gmail.com trongback1222@gmail.com norinecarvellmurzyckizpfu@gmail.com goldenpuffettthomasesvz60i@gmail.com linettewiesswillmerta21y@gmail.com allietalamasmcquearyw7sg@gmail.com annamariocolleykauahiraenr@gmail.com teodorolabatchorlton5ta@gmail.com mollysthomase25@gmail.com rudywaxkalbergm2wa@gmail.com taunyasyonbotros67u55@gmail.com winfredtebbettsdiangelo17gxl@gmail.com lucibodakfessendensyks@gmail.com elwandateresabilel6te@gmail.com davidellingmataalkafjp@gmail.com

<u>Defendant</u>	<u>Email Addresses</u>
Doe 38 d/b/a ritzyish.us	support@leofifty.com tanbd@me.com support@bohodo.com support@rintee.com
Doe 39 d/b/a sheellas.com	support@librastyles.com victorianmendozag915@gmail.com hansonptylers060@gmail.com margueritevfreeman7dzi4@yahoo.com karinacrist88309@gmail.com tiffanyedenfield1119@gmail.com sandramarquez0223@gmail.com jackiehamilton842@gmail.com joleenellamae645127@gmail.com vanhngoailoi658@gmail.com elveraramirez0308@gmail.com royalscott550@gmail.com stephenygradys256@gmail.com jasonredd0609@gmail.com doaiminhkhoaitay87@gmail.com taylorelisabeth361@gmail.com wallacewanda908@gmail.com johnsonchantal48@gmail.com brhmmcdnld@gmail.com emphienthanh1589@gmail.com jillepottert49@gmail.com deborahflannel026@gmail.com bentsuchimoto@gmail.com jacobsewillacet@gmail.com newmanchristina48@gmail.com lorettaglovet513@gmail.com trankimoanh41563@gmail.com marymcgoughcrib@gmail.com emcuaanhnhau587@gmail.com tomaselloya318@gmail.com douthitdennis2@gmail.com cynthiabernabestraw@gmail.com hammondjtjeralds6@gmail.com chimong0918@gmail.com duoingonmanh686@gmail.com jodimartin557@gmail.com derrickpotts886@gmail.com goodmanyjanetteb2@gmail.com marysmith01211962@gmail.com lezleygarcia0528@gmail.com chamelvaayers02@gmail.com

<u>Defendant</u>	<u>Email Addresses</u>
	lawsonydallase43@gmail.com doamanhkhua969@gmail.com janieconfortilair@gmail.com celiabeatriz1222@gmail.com tonystuckert1@gmail.com teresadavidname@gmail.com danielrobinson584839@gmail.com merrittklein82301@gmail.com antunezeduardo12@gmail.com lawsonydallase75@gmail.com careybeyah408@gmail.com guerreroacaseys880@gmail.com duyhoanghanh486@gmail.com josepharrudalyric@gmail.com vanhkhaoitay4768@gmail.com wellsomabels913@gmail.com kimberleyluetta36128@gmail.com damianreed1022@gmail.com kevinsaulsberry477@gmail.com edgarsw705@gmail.com dungtaypha5189@gmail.com hollymashburn72@gmail.com mccarthysealexise391@gmail.com carolinenasir445@gmail.com melissamwades@gmail.com chrismangione1229@gmail.com hamptonbrubye51@gmail.com pleasantsjeffrey938@gmail.com thomasmurphy009974@gmail.com embietsaodc1638@gmail.com minniempauls456@gmail.com dianasgriffina585@gmail.com renneesjeffersonb@gmail.com chinh_gapptech@gmail.com
Doe 40 d/b/a smart-edu-store.myshopify.com	mohammadahlan87@outlook.com smartedu.contact@gmail.com
Doe 41 d/b/a source4student.com	husainrasib_92@outlook.com qabeelbinmuzammilmuzammil@gmail.com

<u>Defendant</u>	<u>Email Addresses</u>
Doe 42 d/b/a stingmall.com	support@stingmall.com tuyethoang70488@gmail.com gregoryfaustinjg3o@yahoo.com tinlaichinhminh5@gmail.com hoanghoang548037@gmail.com hosonduong229513@gmail.com yenphan78571@gmail.com hahuuhien32665@gmail.com
Doe 43 d/b/a studentnclass.myshopify.com	books4kimi@gmail.com Info.StudentNCClass@gmail.com
Doe 44 d/b/a studyhallpress.com	info@studyhallpress.com studyhallpress@gmail.com
Doe 45 d/b/a teespops.com	support@teespops.com vophan36115@gmail.com hongkieu23924@gmail.com peggy6mhart21gfv@yahoo.com lehuongduong298477@gmail.com datunhanrang@gmail.com williamsnorma826@gmail.com marcus4drichards2fpot@yahoo.com stella2dgregory2rysy@yahoo.com harry4zshaw2xmyr@yahoo.com phuongpham52508@gmail.com allen1bmendoza232yy@yahoo.com tyler3vmills2co7l@yahoo.com tranlo45047@gmail.com rhonda0dmeyer24d9w@yahoo.com velma3hhopkins2ooqi@yahoo.com maureenaruizmwwbs@yahoo.com clyde7zcarlson2iw9r@yahoo.com nghiemngo47959@gmail.com arthur7ddouglas2djgf@yahoo.com joanne3xstanley2tfxx@yahoo.com francisco7wgriffith29xvo@yahoo.com ronnie7bsnyder2go04@yahoo.com darren9eford1i05q@yahoo.com constance0nsutton2o0ru@yahoo.com rodney1qsantiago2by49@yahoo.com eugene9fpeters1bkqn@yahoo.com florence3jgarner2lp52@yahoo.com brett6glove2aj2m@yahoo.com vidau42907@gmail.com nhieudemmoben@gmail.com colleen0scurtis2i4sx@yahoo.com kristi7xvasquez2rc0v@yahoo.com

<u>Defendant</u>	<u>Email Addresses</u>
	thile111531@gmail.com gregory0wchapman2e5zj@yahoo.com mark3kknigh25wxy@yahoo.com giadanhnhanhchung@gmail.com rhonda2qmay2qhyr@yahoo.com buihahai168193@gmail.com claudia1pjennings2nw81@yahoo.com maycungtiectnuoi@gmail.com annie3mnichols29pwa@yahoo.com thule875722@gmail.com roitraitimtho@gmail.com trangiahiep598678@gmail.com jackamedinarw4c1@yahoo.com trinhlam33837@gmail.com erin4zkelley2ntbz@yahoo.com willie7ffisher21j51@yahoo.com cody9vmunoz11rig@yahoo.com leon6nschultz2scwc@yahoo.com vuongpham343924@gmail.com velma1hhopkins2ooqj@yahoo.com antonio7ikennedy21y9l@yahoo.com yeutoquantrong@gmail.com buivanhanh864696@gmail.com andre6awarner2elz1@yahoo.com lapnendaithu@gmail.com dathuongtiende@gmail.com nguyentran34647@gmail.com victoriagettis8@yahoo.com thaimai253014@gmail.com peteroray4eydx@yahoo.com melvin9sshelton1ca4z@yahoo.com dongthoidantheo@gmail.com norma3xsims2wglo@yahoo.com lindsaynlucaslastq@yahoo.com dolores6ggriffith21497@yahoo.com gene3hberry2wv6w@yahoo.com dothienluong313211@gmail.com adrian9ybarker1wtj1@yahoo.com ryan2dhaynes20qmg@yahoo.com brent1ialvarez219t5@yahoo.com bangngo301694@gmail.com jasmine9mgrahamto@gmail.com allen3bmendoza232yy@yahoo.com vamanhmequay@gmail.com greg0bkim29thd@yahoo.com

<u>Defendant</u>	<u>Email Addresses</u>
	layla2agomez6s@gmail.com diana9wwells1gb8f@yahoo.com gene1hberry2wv6w@yahoo.com corey6boliver2nauo@yahoo.com gene0jhenry2018x@yahoo.com phillip5wwoods25t79@yahoo.com greg3ubyr28s57@yahoo.com eileen6lfrazier2tw7r@yahoo.com bruce3ycruz2knzr@yahoo.com faye4hspencer2fyen@yahoo.com diepkieu567024@gmail.com
Doe 46 d/b/a testbankklick.com	sales@testbankklick.com testbankklick@gmail.com
Doe 47 d/b/a topbooks.ziploma.com	topbooks@ziploma.com luutoan091086@gmail.com xuantruong21nd@gmail.com
Doe 48 d/b/a valeriehoptop.com	info@valeriehoptop.com jayscollectioncontact@gmail.com devonjacksonforever@gmail.com

2. Defendants' email addresses above were provided to Plaintiffs by payment processors, hosts, and registrars and identified as associated with Defendants' respective websites and accounts.

3. I did not receive bounce-back emails or other messages reporting that my email described in paragraph 1 was undeliverable for all of the email addresses associated with any individual Defendant.

I declare under penalty of perjury that the foregoing is true and correct to the best my knowledge and belief.

DATED: February 14, 2020

/s/ Matthew J. Oppenheim

*Attorneys for Plaintiffs Cengage Learning, Inc.,
Bedford, Freeman & Worth Publishing Group, LLC
d/b/a Macmillan Learning, Elsevier Inc., McGraw
Hill LLC, and Pearson Education, Inc.*